



Connecticut Housing Authorities, Owners, Sponsors,
and Management Companies of State Sponsored Housing Portfolio

Notice: OPRHS 21-015

Distribution Date: March 31, 2021

Subject: Treatment of Stimulus and Unemployment Payments made under Coronavirus Aid (CARES Act and American Rescue Plan Act)

This notice is an expansion of Notice OPRHS 20-011, Treatment of Payments made under Coronavirus Aid (CARES Act), distributed April 17, 2020.

According to HUD Multifamily guidance, Economic Impact Payments (stimulus payments) and supplemental payments under the Federal Pandemic Unemployment Compensation (FPUC) program paid to residents under the CARES Act must **NOT** be included in annual income calculations for an individual who is an applicant for or recipient of benefits or services under any HUD-assisted Multifamily housing program. Please note that unemployment payments received under the Pandemic Unemployment Assistance (PUA) program, which are benefits to individuals who otherwise would not qualify for regular unemployment insurance (UI) and unemployment payments received under the Pandemic Emergency Unemployment Compensation (PEUC) program, which provide an extension to regular UI benefits, all must be included in annual income.

The Department of Housing is adopting this interpretation for benefits received under the CARES Act and the recent American Rescue Plan Act of 2021. Owners/Agents who are managing the State Housing Portfolio, should follow this guidance.

To be clear, you should not be counting the federal stimulus checks as income of residents when completing the initial, annual, and interim certifications. Please remember, however, that any regular payments of unemployment insurance (issued by the State) and the federal PUA and PEUC programs listed above are treated as income and are not exempt by this guidance. It is recommended that staff conducting certifications request documentation from the resident that specifies which pandemic unemployment benefit that the resident received.

For the most up to date information from the State of Connecticut, as well as guidance and other resources visit ct.gov/coronavirus.